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16 *Attorneys for Plaintiff Applications in Internet Time LLC*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19
20 APPLICATIONS IN INTERNET TIME, LLC,

21 Plaintiff,

Civil Action No.: 3:13-CV-00628-RCJ-VPC

22 v.

23 SALESFORCE.COM, INC.,

24 Defendant.

**PLAINTIFF APPLICATIONS IN
INTERNET TIME, LLC'S ANSWER
TO DEFENDANT
SALESFORCE.COM INC.'S
COUNTERCLAIMS**

JURY TRIAL DEMANDED

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26 Plaintiff Applications in Internet Time, LLC ("AIT") responds to the Counterclaims of
27 Defendant Salesforce.com, Inc. ("Salesforce") set forth in Salesforce's Answer and
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Counterclaims to Plaintiff Applications in Internet Time, LLC's Complaint for Patent Infringement (Dkt. No. 24) as follows:

PARTIES

1. AIT admits the allegations in Paragraph 1 of the Counterclaims.
2. AIT admits the allegations in Paragraph 2 of the Counterclaims.

JURISDICTION AND VENUE

3. AIT admits the allegations in Paragraph 3 of the Counterclaims.
4. AIT admits the allegations in Paragraph 4 of the Counterclaims.
5. AIT admits the allegations in Paragraph 5 of the Counterclaims.

FACTUAL BACKGROUND

6. AIT admits the allegations in Paragraph 6 of the Counterclaims.
7. AIT admits the allegations in Paragraph 7 of the Counterclaims.
8. AIT admits the allegations in Paragraph 8 of the Counterclaims.

**COUNT I – DECLARATORY RELIEF REGARDING
NON-INFRINGEMENT OF THE '482 PATENT**

9. AIT incorporates by reference its responses to the previous allegations set forth in the Paragraphs above as if fully set forth herein.

10. AIT denies the allegations in Paragraph 10 of the Counterclaims.
11. AIT admits the allegations in Paragraph 11 of the Counterclaims.
12. AIT denies the allegations in Paragraph 12 of the Counterclaims.

**COUNT II – DECLARATORY RELIEF REGARDING
NON-INFRINGEMENT OF THE '111 PATENT**

13. AIT incorporates by reference its responses to the previous allegations set forth in the Paragraphs above as if fully set forth herein.

14. AIT denies the allegations in Paragraph 14 of the Counterclaims.
15. AIT admits the allegations in Paragraph 15 of the Counterclaims.
16. AIT denies the allegations in Paragraph 16 of the Counterclaims.

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**COUNT III – DECLARATORY RELIEF REGARDING
INVALIDITY OF THE ‘482 PATENT**

17. AIT incorporates by reference its responses to the previous allegations set forth in the Paragraphs above as if fully set forth herein.

18. AIT denies the allegations in Paragraph 18 of the Counterclaims.

19. AIT admits the allegations in Paragraph 19 of the Counterclaims.

20. AIT denies the allegations in Paragraph 20 of the Counterclaims.

**COUNT IV – DECLARATORY RELIEF REGARDING
INVALIDITY OF THE ‘111 PATENT**

21. AIT incorporates by reference its responses to the previous allegations set forth in the Paragraphs above as if fully set forth herein.

22. AIT denies the allegations in Paragraph 22 of the Counterclaims.

23. AIT admits the allegations in Paragraph 23 of the Counterclaims.

24. AIT denies the allegations in Paragraph 24 of the Counterclaims.

PRAYER FOR RELIEF

WHEREFORE, AIT prays for judgment and seeks relief against Salesforce as follows:

A. That all relief requested by AIT in its Complaint be granted;

B. That all relief requested by Salesforce in its Answer and Counterclaims to Plaintiff Applications in Internet Time, LLC’s Complaint for Patent Infringement be denied and that Salesforce takes nothing by way of Counterclaims;

C. That Salesforce’s Counterclaims be dismissed in their entirety with prejudice.

D. That the Court grant AIT further relief as the Court deems just and proper.

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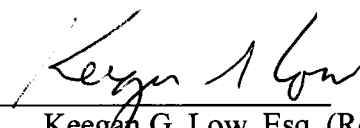
JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, AIT hereby requests a trial by jury of any and all issues so triable that arise out of or relate to Salesforce's Counterclaims.

Dated: February 12, 2014

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By


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*Attorneys for Plaintiff Applications in
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of ROBISON, BELAUSTEGUI, SHARP & LOW, and that on this date I caused to be served a true copy of **PLAINTIFF APPLICATIONS IN TIME, LLC'S ANSWER TO DEFENDANT SALESFORCE.COM INC.'S COUNTERCLAIM - JURY TRIAL DEMANDED** on all parties to this action by the method(s) indicated below:

 X by placing true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

Kevin Johnson
Ray Zado
Quinn Emanuel Urquahrt & Sullivan, LLP
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, CA 94065

 X by using the Court's CM/ECF Electronic Notification System addressed to:

Leigh Goddard, Esq.
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 by personal delivery/hand delivery addressed to:

 by facsimile (fax) addressed to:

 by Federal Express/UPS or other overnight delivery addressed to:

DATED: This 13th day of February, 2014



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